

Lance D. Orloff (SBN 116070)  
Alexis A. Arteaga (SBN 356798)  
GRANT, GENOVESE & BARATTA, LLP  
2030 Main Street, Suite 1600  
Irvine, CA 92614  
Telephone: (949) 660-1600  
Facsimile: (949) 660-6060  
Email: ldo@ggb-law.com; aaa@ggb-law.com; eservice@ggb-law.com  
6080.451

Attorneys for Defendant Los Angeles Auto Wholesalers & Recovery Services, Inc.

**CENTRAL DISTRICT OF CALIFORNIA**

DOUGLAS GALANTER,  
Plaintiff,

vs.

LOS ANGELES AUTO WHOLESALERS  
& RECOVERY SERVICES, INC.,

Defendant.

Case No. 2:23-cv-09466-ODW

**DECLARATION OF LANCE D.  
ORLOFF IN SUPPORT OF  
DEFENDANT LOS ANGELES AUTO  
WHOLESALERS & RECOVERY  
SERVICES, INC.'S MOTION FOR  
SUMMARY JUDGMENT**

**[Filed concurrently with Motion for  
Summary Judgment, or, Alternatively,  
Partial Summary Judgment;  
Declaration of Lance D. Orloff;  
Declaration of Juan Martinez; Index of  
Documentary Evidence; and [Proposed]  
Order]**

Date: April 21, 2025

Time: 1:30 p.m.

Courtroom: 5D

Trial date: August 19, 2025

**DECLARATION OF LANCE D. ORLOFF**

I, Lance D. Orloff, hereby declare and state as follows:

1. I am an attorney at law duly licensed to practice before this and all courts of the State of California. I am a partner with the law firm of Grant, Genovese & Baratta, LLP, attorneys of record for Defendant Los Angeles Auto Wholesalers & Recovery Services, Inc. (LAWRSI). I make this declaration in support of Defendant Los Angeles Auto Wholesalers & Recovery Services, Inc.'s Motion for Summary Judgment, or, Alternatively, Partial Summary Judgment. I have knowledge of the facts set forth herein. If called as a witness, I could and would completely testify thereto.

2. I have reviewed each of the documents attached as exhibits to the Index of Documentary Evidence ("IDE") and believe each to be true and accurate copies of same.

3. Plaintiff, Douglas Galanter filed his complaint on November 29, 2023, against Defendant Access Finance and Defendant Los Angeles Auto Wholesalers & Recovery Services Inc. (LAWRSI) seeking damages for alleged violations of the Fair Debt Collection Practices Act, Rosenthal Act, and for Conversion. Attached as **Exhibit A** to the IDE and incorporated herein by reference is a true and correct copy of Plaintiff's First Amended Complaint.

4. On or about November 18, 2024, Galanter was deposed. Attached as **Exhibit C** to the IDE and incorporated hereby by reference is a true and correct copy of the deposition transcript of Galanter.

5. Galanter has not produced any evidence as to LAWRSI's skip-tracing services, phone call efforts, or other collections practices that would display an attempt to collect a debtor's payment for their debt or even direct a debtor to pay their lender.

6. Galanter produced a receipt billed to the condominium's homeowner's association for new brackets, new chain, and new remotes with regard to the condominium gate dated October 10, 2022, approximately eleven months prior to the date of repossession. Attached as **Exhibit H** to the IDE and incorporated hereby by reference is a true and correct copy of the gate repair invoice produced by Galanter in

1 accordance with Federal Rule of Procedure 26(a)(1).

2 7. Galanter produced photos and screenshots of messages from Galanter's ex-  
3 wife, a resident of the condominium complex, of the disrupted gate motor. Attached as  
4 **Exhibit I** to the IDE and incorporated hereby by reference is a true and correct copy of  
5 the gate photos and text message screenshots produced by Galanter in accordance with  
6 Federal Rule of Procedure 26(a)(1).

7 8. According to the screenshots, Galanter's ex-wife's text messages were sent  
8 two days after the repossession.


9 9. Galanter has produced no evidence to display that McIntosh himself, or any  
10 of LAWRSI's agents caused the gate to break.

11 10. Galanter has produced no evidence that LAWRSI or its employees regularly  
12 engage in debt collection by actively directing debtors to pay their notes.

13 11. No evidence has been produced to display any property of Galanter was  
14 harmed before, during, or after this repossession occurred.

15 12. On November 21, 2024, LAWRSI tow-truck driver Steven McIntosh was  
16 deposed. Upon information and belief, Steven McIntosh is no longer employed by  
17 LAWRSI. Attached as **Exhibit J** to the IDE and incorporated hereby by reference is a  
18 true and correct copy of Steven McIntosh's deposition transcript.

19  
20 I declare under penalty of perjury according to the laws of the State of California  
21 that the foregoing is true and correct. Executed this 24<sup>th</sup> day of March, 2025, at Irvine,  
22 California.

23  
24 By:   
25 LANCE D. ORLOFF  
26 Attorney for Defendant Los Angeles Auto  
27 Wholesalers & Recovery Services, Inc.  
28